

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 1, 2, and 6 have been amended for clarity and to overcome the objections in Section 5 of the office action. These amendments are considered to be non-narrowing, and no estoppel should be deemed to attach thereto.

The abstract has been amended to overcome the objection in Section 4 of the office action.

A substitute specification is enclosed for the purpose of overcoming the objections in Section 4 of the office action. Also, a marked-up copy of the specification, showing the changes made to the specification, is enclosed. No new matter is believed to be introduced by the amendment of the specification.

Claim 1 stands rejected, under 35 USC §102(e), as being anticipated by Lee et al. (US 6,535,493). Claims 2, 3, and 6 stand rejected, under 35 USC §103(a), as being unpatentable over Lee et al. (US 6,535,493) in view of Gwon (US 2003/0016655). Claims 4 and 5 stand rejected, under 35 USC §103(a), as being unpatentable over Lee et al. (US 6,535,493) in view of Gwon (US 2003/0016655) and Linder et al. (US 2002/0194385). The Applicants respectfully traverse these rejections based on the points set forth below.

Claim 1 defines a mobile terminal apparatus that binds a home address of a first network interface, which loses network connectivity, and one of a home address and a care-of-address of a second network interface. The claimed subject provides an advantage of enabling a mobile terminal to maintain communication with a network by temporarily borrowing a second network

interface address when communication through the address of a first network interface is disrupted, such as when the mobile terminal is experiencing a base station handoff (see original specification page 20, third paragraph).

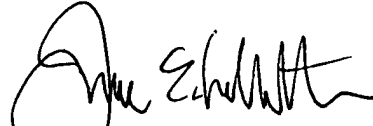
The Office Action proposes that Lee discloses binding a home address of a first network interface, which loses network connectivity, and one of a home address and a care-of-address of a second network interface through the operation identified by reference character 310 in Fig. 3 (see Office Action page 4, second to last paragraph). However, Lee discloses in Fig. 3 that upon receiving 302 an advertisement from an agent, a mobile unit updates 310 its registration table to reflect that the agent is the home agent if the mobile terminal determines that it is residing 306 in its home network but has not returned 308 to its home base (see Lee Fig. 3 and col. 8, lines 41-53). Lee's disclosure of updating a registration table to reflect that an agent communicating an advertisement is a home agent is not identical to the claimed feature of binding a home address of a first network interface, which loses network connectivity, and one of a home address and a care-of-address of a second network interface.

Accordingly, the Applicants respectfully submit that Lee does not anticipate the subject matter defined by claim 1. Independent claim 6 similarly recites the above-mentioned subject matter distinguishing apparatus claim 1 from the applied references, but with respect to a method, and Gwon is not cited in the Office Action for supplementing Lee in this regard. Therefore, the rejections applied to claims 2-6 are obviated, and allowance of claims 1 and 6 and all claims dependent therefrom is warranted.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication,
the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone
number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Ledbetter", written over the printed name.

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JEL/DWW/att

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